

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

UNITED STATES EQUAL EMPLOYMENT  
OPPORTUNITY COMMISSION,

Plaintiff,

v.

GBMC HEALTHCARE., ET AL.,

Defendants.

C.A. NO. 1:24-CV-02803-JKB

**DEFENDANTS' MOTION FOR EXTENSION OF TIME TO RESPOND  
TO THE EEOC'S OPPOSED MOTION TO EXTEND DISCOVERY  
PERIOD AND INCREASE DEPOSITION HOURS**

Defendants, GBMC Healthcare, Inc. and Greater Baltimore Medical Center, Inc. (together "GBMC" or "Defendants"), by and through undersigned counsel Ogletree, Deakins, Nash, Smoak & Stewart, P.C, respectfully submit this Motion for Extension of Time to Respond to the EEOC'S Opposed Motion to Extend Discovery Period and Increase Deposition Hours. In support, Defendants State:

1. On May 22, 2025, the Court issued a Scheduling Order in this case that, *inter alia*, set October 30, 2025, as the discovery deadline and capped deposition hours at 16 hours per side. (ECF 26).

2. Since May 22, 2025, the parties have engaged in discovery by serving and responding to written discovery, exchanging documents, and holding depositions.

3. At the current time, GBMC has taken the deposition of the Charging Party Jennifer Hoffman, and the EEOC has taken the depositions of two GBMC fact witnesses. The EEOC has an additional five depositions already scheduled with two more depositions set to be scheduled. Following those depositions, the EEOC will have deposed all individuals identified in GBMC's written discovery as possessing personal knowledge of the facts alleged in the lawsuit and defenses

thereto before the current discovery deadline.

4. On September 18, 2025, the EEOC filed an Opposed Motion to Extend Discovery Period and Increase Deposition Hours (“EEOC’s Motion”).

5. Under the Federal Rules of Civil Procedure and this Court’s Local Rules, GBMC’s response is due within 14 days, by October 2, 2025.

6. GBMC intends to prepare and file an Opposition to EEOC’s Motion.

7. However, due to undersigned counsels’ litigation schedule and other scheduling conflicts, including two scheduled out of state work trips that occurred or are scheduled to occur between September 18th and October 3rd, GBMC will be unable to prepare and file a response by the current deadline.

8. GBMC is therefore requesting an eight-day extension, until October 10, 2025, to file its Opposition to the EEOC’s Motion.

9. In anticipation of needing additional time to prepare and file an Opposition to the EEOC’s Motion, undersigned counsel contacted counsel for the EEOC on September 30, 2025, to request the EEOC’s consent to file this Motion and request for extension.

10. Citing the fact that 30 days remain in the discovery period, the EEOC refused GBMC’s request for its consent to file this motion. **Exhibit A.**

11. Good cause exists for the granting of this request for extension as it will allow Defendants to properly prepare and respond to the EEOC’s Motion.

12. Moreover, no parties will be prejudiced by this request. The current discovery period remains open for 30 more days, and the EEOC has scheduled depositions throughout the month of October in anticipation of that deadline.

WHEREFORE, Defendants respectfully request for this Court to enter an order granting

Defendants an additional eight days, until October 13, 2025, to respond to the EEOC's Motion, and for any other relief the court deems just and proper.

Dated: September 30, 2025

Respectfully Submitted,

/s/ Jordan F. Dunham

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing was served this 30th day of September 2025, via this Court's Electronic Case Filing System, upon:

Emily Marie Datnoff  
Debra Michele Lawrence  
Sabrina Brown  
U.S. Equal Employment Opportunity Commission  
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*Attorneys for Plaintiff*

/s/ Jordan F. Dunham

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